

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**AMANDA BRUMFIELD On Behalf of
HERSELF and All Others Similarly
Situating,**

Plaintiff,

v.

**KINDRED HEALTHCARE, INC. and
KINDRED HEALTHCARE
OPERATING, INC. d/b/a KINDRED
AT HOME,**

Defendant.

COLLECTIVE ACTION

CASE NO. 2:18-cv-00591

JURY TRIAL DEMANDED

DECLARATION OF CYNTHIA HARRIS

I, Cynthia Harris, under penalty of perjury and pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am an adult citizen and resident of the State of Georgia, of sound mind, and I am competent to testify upon personal knowledge regarding the matters set forth herein.

2. I am a Licensed Practical Nurse ("LPN").

3. I was employed by Kindred as a home health LPN from approximately May 2014 to June 2015 out of its Marietta, Georgia office.

4. As a home health LPN, I provided home health care to Kindred's clients. I was responsible for travelling to patients' homes, providing care to homebound patients, completing all necessary medical charts and other required paperwork from home, communicating by phone with patients and other health care providers from home, taking samples to the lab, attending meetings as dictated by Kindred, and performing other duties necessary to perform my job.

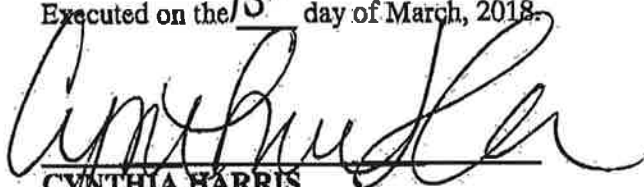
Throughout my tenure at Kindred, I regularly worked more than 40 hours in a workweek performing these work activities.

5. Kindred paid me a fee for each patient visit. However, Kindred did not pay me overtime pay for hours I worked over 40 in a workweek.

6. There are other home health LPNs and PTAs working out of the Marietta, Georgia office and it is my understanding that they are compensated the same way that I was. I know this from conversations I have had with my fellow employees as well as from my experience working as a home health LPN.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 15th day of March, 2018.


CYNTHIA HARRIS